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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

10 LORENA LEDEZMA,) CASE NO.: 3:11-CV-04376-JCS
11 Plaintiff,)
12 v.) JOINT STIPULATION OF THE PARTIES TO
13 BLACKSTONE CONSULTING, INC.,) CONTINUED CASE MANAGEMENT
14) CONFERENCE
15 Defendant.) Conference Date: December 14, 2012
16) Time: 9:30 a.m.
17) Courtroom: G

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20 This stipulation is entered into by and between Plaintiff Lorena Ledezma ("Ledezma")
21 and Defendant Blackstone Consulting, Inc. ("BCI"). Ledezma and BCI represent to the Court,
22 agree and stipulate as follows:

23 WHEREAS, Ledezma filed this lawsuit on September 1, 2011;

24 WHEREAS, on September 1, 2011, the Court issued an Order Setting Initial Case
25 Management Conference and ADR Deadlines in this matter, setting the Initial Case
26 Management Conference for December 16, 2011 at 1:30 p.m. in Courtroom G of this Court,
27 located at 15th Floor, 450 Golden Gate Avenue, San Francisco CA;

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1 WHEREAS, on November 18, 2011, the Court issued a Clerk's Notice advancing the
2 Initial Case Management Conference to December 14, 2011 at 9:30 a.m. in the same location;

3 WHEREAS, on December 5, 2011, the Summons and Complaint in this matter were
4 placed in the United States Mail, certified, return receipt requested, by the United States
5 Marshall's Office;

6 WHEREAS, on or about December 7, 2011, Defendant BCI received the Summons and
7 Complaint in the mail;

8 WHEREAS, the Clerk's Notice regarding the advancement of the Initial Case
9 Management Conference was not served along with the Summons and Complaint.

10 WHEREAS, on December 9, 2011, Lerman & Pointer LLP was retained by BCI to
11 represent BCI in the defense of matter.

12 WHEREAS, on December 12, 2011, Karen E. Pointer of Lerman & Pointer LLP
13 checked the online docket for this matter and only then learned that an Initial Case Management
14 Conference was scheduled for December 14, 2011;

15 WHEREAS, Lerman & Pointer LLP has had insufficient time to review documents and
16 conduct an investigation into the allegations in the Complaint;

17 WHEREAS, the parties have not had an opportunity to meet and confer regarding
18 matters necessary to meaningfully participate in the Initial Case Management Conference on
19 December 14 2011, including, without limitation, initial disclosures, early settlement, ADR
20 process selection, and discovery plan;

21 WHEREAS, the parties agree that additional time is needed to complete relevant
22 investigations and meet and confer in preparation for the Initial Case Management Conference;

23 IT IS THEREFORE STIPULATED THAT the Initial Case Management Conference in
24 this matter be continued to a date convenient for the Court that is at least 60 days from the date
25 of this stipulation.

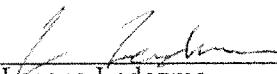
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1 IT IS SO STIPULATED.
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3 Dated: December 13, 2011


Lorena Ledezma

6 Dated: December 13, 2011

LERMAN & POINTER LLP

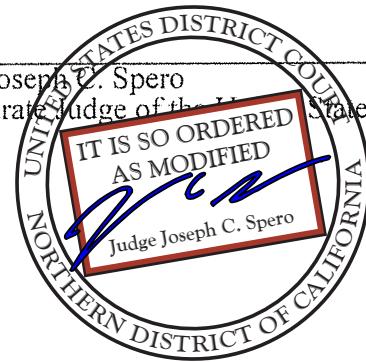
7 By:


Karen E. Pointer, Esq.
Attorneys for Defendant Blackstone Consulting,
Inc.

12 PURSUANT TO STIPULATION, IT IS SO ORDERED . The case management conference is
13 continued to Feb. 17, 2012 at 1:30 p.m. Joint cmc statement due by Feb. 10, 2012.

14 Dated: December 14, 2011

15 Hon. Joseph C. Spero
Magistrate Judge of the _____ States District Court



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